Kristin L. Jacobson, Regulatory Counsel
201 Mission Street, Suite 1500
San Francisco, CA 94105
Tel: 707-816-7583   Fax: 415-684-7339
Email: kristin.l.jacobson@sprint.com

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Sprint

IDAHO PUBLIC
UTILITIES COMMISSION

October 15, 2013

Ms. Jean Jewell, Commission Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID   83720-0074

RE: Case No. GNR-T-13-01
        Virgin Mobile USA, L.P.'s 2013 Federal ETC Filing (FCC Form 481)

Dear Ms. Jewell:

Enclosed for filing with this Commission is Virgin Mobile USA, L.P.'s 2012 Annual Carrier Report (Form 481) filed with the FCC. Please note that the funding year for this report is 2014.

If you have any questions regarding this report, please feel free to contact me. My contact information is shown above.

Very truly yours,
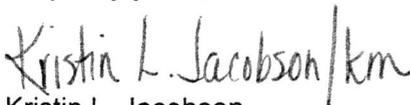
Kristin L. Jacobson/km

Kristin L. Jacobson

FCC Form 481 - Carrier Annual Reporting Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
<030>	Contact Name: Person USAC should contact with questions about this data	Andrew M. Lancaster
<035>	Contact Telephone Number: Number of the person identified in data line <030>	913-762-6107
<039>	Contact Email Address: Email of the person identified in data line <030>	andy.m.lancaster@sprint.com

ANNUAL REPORTING FOR ALL CARRIERS

			54.313 Completion Required	54.422 Completion Required
			(check box when complete)	
<100>	Service Quality Improvement Reporting	*(complete attached worksheet)*	☐	
<200>	Outage Reporting (voice)	*(complete attached worksheet)*		✓
<210>	✓ <-- check box if no outages to report			
<300>	Unfulfilled Service Requests (voice)		☐	
<310>	Detail on Attempts (voice)	*(attach descriptive document)*		
<320>	Unfulfilled Service Requests (broadband)			
<330>	Detail on Attempts (broadband)	*(attach descriptive document)*		
<400>	Number of Complaints per 1,000 customers (voice)			✓
<410>	Fixed			
<420>	Mobile 0.0			
<430>	Number of Complaints per 1,000 customers (broadband)			
<440>	Fixed			
<450>	Mobile			
<500>	Service Quality Standards & Consumer Protection Rules Compliance	*(check to indicate certification)*		✓
<510>	479015id510	*(attached descriptive document)*		✓
<600>	Functionality in Emergency Situations	*(check to indicate certification)*		✓
<610>	479015id610	*(attached descriptive document)*		✓
<700>	Company Price Offerings (voice)	*(complete attached worksheet)*		
<710>	Company Price Offerings (broadband)	*(complete attached worksheet)*		
<800>	Operating Companies and Affiliates	*(complete attached worksheet)*		☐
<900>	Tribal Land Offerings (Y/N)? ◯ ◯	*(if yes, complete attached worksheet)*		
<1000>	Voice Services Rate Comparability	*(check to indicate certification)*	☐	
<1010>		*(attach descriptive document)*		
<1100>	Terrestrial Backhaul (Y/N)? ◯ ◯	*(if not, check to indicate certification)*		
<1110>		*(complete attached worksheet)*	☐	
<1200>	Terms and Condition for Lifeline Customers	*(complete attached worksheet)*		✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	*(check to indicate certification)*	☐	
<2005>	*(complete attached worksheet)*	☐	

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	*(check to indicate certification)*	☐	
<3005>	*(complete attached worksheet)*	☐	

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>   913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030>   andy.m.lancaster@sprint.com

<110> Has your company received its ETC certification from the FCC?   (yes / no) ◯ ◯

<111> If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?   (yes / no) ◯ ◯

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

Please check these boxes below to confirm that the attached PDF, on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

Name of Attached Document (.pdf)

<113> Maps detailing progress towards meeting plan targets

<114> Report how much universal service (USF) support was received

<115> How (USF) was used to improve service quality

<116> How (USF)was used to improve service coverage

<117> How (USF) was used to improve service capacity

<118> Provide an explanation of network improvement targets not met in the prior calendar year.

(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030> 913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030> andy.m.lancaster@sprint.com

<220>

<a> NORS Reference Number	<b1> Outage Start Date	<b2> Outage Start Time	<b3> Outage End Date	<b4> Outage End Time	<c1> Number of Customers Affected	<c2> Total Number of Customers	<d> 911 Facilities Affected (Yes / No)	<e> Service Outage Description (Check all that apply)	<f> Did This Outage Affect Multiple Study Areas (Yes / No)	<g> Service Outage Resolution	<h> Preventative Procedures
					-- See attached worksheet --						

10/10/2013

(700) Price Offerings including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>   913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030>   andy.m.lancaster@sprint.com

<701> Residential Local Service Charge Effective Date   1/1/2013

<702> Single State-wide Residential Local Service Charge

<703>

State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
				-- See attached worksheet				
				--				

(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>   913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030>   andy.m.lancaster@sprint.com

<711>

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
			-- See attached					
			worksheet --					

10/10/2013

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	913-762-6107
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<810>	Reporting Carrier	Virgin Mobile USA LP
<811>	Holding Company	Sprint Corporation
<812>	Operating Company	

<813>

<a1>	<a2>	<a3>
Affiliates	SAC	Doing Business As Company or Brand Designation
	-- See attached worksheet --	

10/10/2013

(500) Tribal Lands Reporting **Data Collection Form**	**FCC Form 481** **OMB Control No. 3060-0986/OMB Control No. 3060-0819** **July 2013**

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>   913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030>   andy.m.lancaster@sprint.com

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document (.pdf)

If your company serves Tribal lands, please select (Yes,No, NA) for
each these boxes to confirm the status described on the attached
PDF, on line 920, demonstrates coordination with the Tribal
government pursuant to § 54.313(a)(9) includes:

	Select (Yes,No, NA)
<921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions;	▨
<922> Feasibility and sustainability planning;	
<923> Marketing services in a culturally sensitive manner;	
<924> Compliance with Rights of way processes	
<925> Compliance with Land Use permitting requirements	
<926> Compliance with Facilities Siting rules	
<927> Compliance with Environmental Review processes	
<928> Compliance with Cultural Preservation review processes	
<929> Compliance with Tribal Business and Licensing requirements.	

10/10/2013

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>   913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030>   andy.m.lancaster@sprint.com

Please check this box to confirm no terrestrial backhaul
<1120> options exist within the supported area pursuant to § 54.313(G)   ☐

Please check this box to confirm the reporting carrier offers
broadband service of at least 1 Mbps downstream and 256 kbps
<1130> upstream within the supported area pursuant to § 54.313(G)   ☐

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	913-762-6107
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of attached document (.pdf)

<1220> Link to Public Website

HTTP ___ http://www.assurancewireless.com/Public/TermsandConditions.aspx

"Please check these boxes below to confirm that the attached PDF,
on line 1210, or the website listed, on line 1220,
contains the required information pursuant to §
54.422(a)(2) annual reporting for ETCs receiving low-income
support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice
telephony service plans offered to Lifeline subscribers,   [✓]

<1222> Details on the number of minutes provided as part of the plan,   [✓]

<1223> Additional charges for toll calls, and rates for each such plan.   [✓]

10/10/2013

(900) Price Cap Carrier Additional Documentation
Data Collection Form
Including Rate of Return Carriers affiliated with Price Cap local Exchange Carriers

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
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<035>	Contact Telephone Number - Number of person identified in data line <030>	913-762-6107
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e) the information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<2010>   2nd Year Certification (47 CFR § 54.313(b)(1))

<2011>   3rd Year Certification (47 CFR § 54.313(b)(2))

☐☐

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

<2012>   2013 Frozen Support Certification

<2013>   2014 Frozen Support Certification

<2014>   2015 Frozen Support Certification

<2015>   2016 and future Frozen Support Certification

☐☐☐☐

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

<2016>   Certification Support Used to Build Broadband

☐

Connect America Phase II Reporting (47 CFR § 54.313(e))

<2017>   3rd year Broadband Service Certification

<2018>   5th year Broadband Service Certification

<2019>   Interim Progress Certification

<2020>   Please check the box to confirm that the attached PDF, on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

☐☐☐☐

<2021>   Interim Progress Community Anchor Institutions   _____ Name of Attached Document Listing Required Information

10/10/2013

(100) Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	913-762-6107
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Progress Report on 5 Year Plan

(3010) Milestone Certification (47 CFR § 54.313(f)(1)(i))
Please check this box to confirm that the attached PDF, on line 3012, contains the required information pursuant to § 54.313 (f)(1)(i), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.
Name of Attached Document Listing Required Information

(3011)

(3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(ii))

(3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2)) ☐(Yes/No)

(3014) If yes, does your company file the RUS annual report ☐(Yes/No)
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:
Name of Attached Document Listing Required Information

(3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) ☐

(3016) PDF of Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

(3018) If the response is no on line 3014, is your company audited? ☐(Yes/No)
If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains

(3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers; ☐
Name of Attached Document Listing Required Information

(3020) PDF of Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3021) Management letter issued by the independent certified public accountant that performed the company's financial audit. ☐
If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

(3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, ☐

(3023) Underlying information subjected to a review by an independent certified public accountant ☐

(3024) Underlying information subjected to an officer certification. ☐

(3025) PDF of Balance Sheet, Income Statement and Statement of Cash Flows ☐

(3026) Attach the worksheet listing required information
Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	913-762-6107
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier:	Virgin Mobile USA LP
Signature of Authorized Officer:	CERTIFIED ONLINE Date 10/10/2013
Printed name of Authorized Officer:	Jay Franklin
Title or position of Authorized Officer:	Assistant Controller
Telephone number of Authorized Officer:	913 762-6107
Study Area Code of Reporting Carrier:	479015 Filing Due Date for this form: 10/15/2013

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	479015
<015>	Study Area Name	Virgin Mobile USA LP
<020>	Program Year	2014
<030>	Contact Name - Person USAC should contact regarding this data	Andrew M. Lancaster
<035>	Contact Telephone Number - Number of person identified in data line <030>	913-762-6107
<039>	Contact Email Address - Email Address of person identified in data line <030>	andy.m.lancaster@sprint.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I certify that (Name of Agent)_____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.

Name of Authorized Agent:		
Name of Reporting Carrier:		
Signature of Authorized Officer:		Date:
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.

Name of Reporting Carrier:		
Name of Authorized Agent or Employee of Agent:		
Signature of Authorized Agent or Employee of Agent:		Date:
Printed name of Authorized Agent or Employee of Agent:		
Title or position of Authorized Agent or Employee of Agent		
Telephone number of Authorized Agent or Employee of Agent:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

<010> Study Area Code   479015

<015> Study Area Name   Virgin Mobile USA LP

<020> Program Year   2014

<030> Contact Name - Person USAC should contact regarding this data   Andrew M. Lancaster

<035> Contact Telephone Number - Number of person identified in data line <030>   913-762-6107

<039> Contact Email Address - Email Address of person identified in data line <030>   andy.m.lancaster@sprint.com

<810> Reporting Carrier   Virgin Mobile USA LP

<811> Holding Company   Sprint Corporation

<812> Operating Company

<813>		
Affiliates	**SAC**	**Doing Business As Company or Brand Designation**
Virgin Mobile USA LP	479015	Assurance Wireless

10/10/2013

Steve Largent
President/CEO

August 16, 2012

Mr. Dan Hesse
President and Chief Executive Officer
Sprint Nextel Corporation
6200 Sprint Parkway, Mailstop: KSOPHF0410-4A421
Overland Park, KS 66251

Dear Dan:

Congratulations! This letter is to notify you that Sprint Nextel Corporation ("Sprint") and the Sprint Prepaid Group (Virgin Mobile USA, Boost Mobile, and Assurance Wireless) have completed the recertification process for the CTIA Consumer Code for Wireless Service ("Voluntary Consumer Code") for the period January 1, 2012 – December 31, 2012, and are deemed compliant with the principles, disclosures and practices set forth in the Voluntary Consumer Code. Accordingly, Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless are authorized to use and display the CTIA Seal of Wireless Quality/Consumer Information, subject to the terms and conditions set forth in the attached License Agreement.

Please ensure that the relevant employees of Sprint, Virgin Mobile USA, Boost Mobile and Assurance Wireless review the License Agreement before using the Seal. Use of the Seal constitutes acceptance of these terms and conditions. Upon request, CTIA will provide two specimens (color and black/white) of the Seal for use on Sprint's, Virgin Mobile USA's, Boost Mobile's and Assurance Wireless' respective websites and in their respective collateral materials. If you should have any questions concerning the recertification process or use of the Seal, please contact Michael Altschul, CTIA's Senior Vice President & General Counsel, at (202) 736-3248 or maltschul@ctia.org..

CTIA commends Sprint for its ongoing leadership and participation in the CTIA Voluntary Consumer Code, and we look forward to continuing to work with Sprint on this important industry initiative.

Sincerely,

Congratulations!

Steve

Steve Largent

Attachment

cc: Charles McKee
      Vice President, Government Affairs - Federal & State Regulatory

SEAL OF WIRELESS QUALITY/CONSUMER INFORMATION

<u>LICENSE AGREEMENT</u>

Company is hereby granted a non-exclusive, world-wide, royalty-free license to use CTIA's Seal of Wireless Quality/Consumer Information ("Seal") to represent that Company voluntarily adopts and follows the *CTIA Consumer Code for Wireless Service* and has certified such to CTIA.

CTIA permits the use of appropriate references to CTIA and the Seal solely in connection with the *CTIA Consumer Code for Wireless Service* Program. References to the Seal shall not be misleading as to the extent of Company's voluntary support and participation in the CTIA Voluntary Code for Consumer Information program. The Seal may appear in Company's advertising, promotional material or other literature to indicate its voluntary and consistent application of the *CTIA Consumer Code for Wireless Service*.

Upon CTIA's acknowledgement of Company's certification, CTIA shall supply Company with a specimen of the Seal. Company shall not modify or alter the Seal without prior written permission from CTIA, and such permission shall not be unreasonably withheld. Company agrees to amend or discontinue the use of the Seal upon written request of CTIA. Company shall immediately cease use of the seal upon receipt of CTIA's written notice to do so.

Company assumes full and complete responsibility for its use of the Seal, and agrees that its use of the Seal constitutes a declaration that Company voluntarily adopts and follows the principles set forth in the *CTIA Consumer Code for Wireless Service*.

Use of the Seal for other purposes than those stated in this License Agreement is an unauthorized use of the Seal and is strictly prohibited.

This license may be renewed annually subject to Company's successful completion of the certification process.

Use of the Seal constitutes acceptance of these legal terms and conditions.

Sprint

Sprint Business Continuity Program Overview

Purpose

The purpose of this document is to provide approved information that can be shared with interested parties in order to illustrate that Sprint is committed to an efficient and effective corporate approach with respect to Business Continuity Planning, Incident Management and Disaster Recovery. This document will explain the core components of the Sprint Business Continuity Program and the structure by which it is implemented.

Business Continuity Program Mission

Assure the continuation of Sprint's mission critical business operations and services. Minimize financial damage and damage to Sprint's brand, its employees and customers, following significant business disruptions.

Program Introduction

As businesses, government agencies, and individual consumers become more and more reliant on wireline and wireless communications, as well as remote access to information, the concept of Business Continuity has never been more important. Sprint takes Business Continuity to the next level by ensuring that it is part of the corporation's business philosophy. This philosophy promotes utilizing business continuity principles, guidelines, and standards by all company employees in their day to day business operations.

Sprint's Business Continuity (BC) Program is based on industry accepted principles. Sprint has adapted key principles from the Disaster Recovery Institute International (DRII), ASIS Organizational Resilience Standard, Federal Emergency Management Agency (FEMA), Business Continuity Institute (BCI), American National Standards Institute (ANSI), NFPA 1600, and several Military Specifications (Mil-Spec) standards, into 3 BC Program Elements: Program Governance, Incident Management, and Continuity Analysis & Planning, as defined below:

Program Governance

Program Governance Structure– Program structure, mandate and executive sponsorship is required to ensure a comprehensive Business Continuity Program.

Program Management & Continuous Improvement - Overall program management and continuous improvement includes all of the documentation and efforts designed to ensure a well-defined BC program that seeks to continually mature performance and processes.

Incident Management

Incident Management & Crisis Communications – Enterprise Incident Management Team (EIMT) and Incident Management Team (IMT) documentation, training, exercises and continuous improvement are required for those teams that have roles and responsibilities before, during or after an incident that significantly affects Sprint's employees, customers and/or shareholders.

Continuity Analysis & Planning

Criticality Analysis & Risk Management – Criticality Rating is necessary for prioritizing tasks and recovery. Risks that threaten the company's critical functions, vendors, sites, systems and network elements, require due diligence that result in decisions to mitigate or accept the risks.

Mitigation Strategies & Plan Development - After determining criticality and risks, the next steps include devising the appropriate mitigation strategies and recovery capabilities. BC plan development is formalized using on-line tools.

## Program Governance Structure Overview

Overall BC Program governance requires executive sponsorship, a structure for decision making, and a means to direct and manage incremental changes towards goals and objectives. Sprint's program governance structure achieves each of these requirements and accomplishes them through inclusion and diversity of thought and viewpoint. The following describes the program governance structure that begins with the highest levels of the company and leverages management and expertise for optimal effectiveness.

Executive Command Team (ECT) - The ECT consists of Sprint's highest level executives, representing all critical Sprint functions. The ECT provides executive sponsorship of the overall Business Continuity Program and is briefed on issues and status of projects that require senior executive attention.

Business Continuity Office (BCO) - The BCO is the program office responsible for establishing the policy, structure, and methodology for developing, maintaining, and testing enterprise-wide BC and Disaster Recovery Plans. During an incident, the BCO is responsible for coordinating cross functional incident management activities of the Enterprise Incident Management Team (EIMT).

Business Continuity Committee (BCC) – The BCC is comprised of Business Continuity Teams (BCTs). The BCC is responsible for assuring business continuity policies, guidelines, standards and tools are implemented consistently across the company and acts as a forum for business continuity discussions. BCTs have overall responsibility for the implementation of business continuity initiatives within their individual business units and act as business unit Incident Management Teams (IMT) for their business units when disasters occur. The BCC has various sub-committees that focus on proactive planning, incident management, tools and training, awareness, pandemic planning and other issues that require attention.

Program Governance Structure

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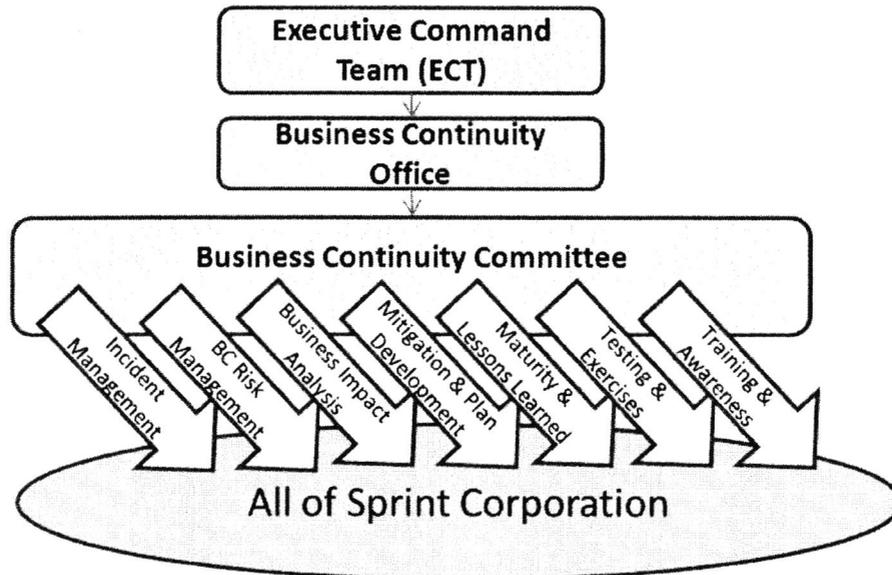
Program Management & Continuous Improvement

The concepts of Program Management and Continuous Improvement are the overarching control elements that bookend all other aspects of the BC Program. For each of the other Program Elements, Program Management efforts will provide definition of what the Program Element should accomplish and the methods used to achieve objectives. The Continuous Improvement efforts provide a means to keep the Program Elements evergreen, current, and striving for maturity.

Program Management	Incident Management & Crisis Communications	Continuous Improvement
• Structure • Reporting • Awareness & Communication • Process & Standards • Documentation • Maintenance	Criticality Analysis & Risk Management Mitigation Strategies & Plan Development	• Training • Exercises • After Action Reviews • Maturity Model Assessments
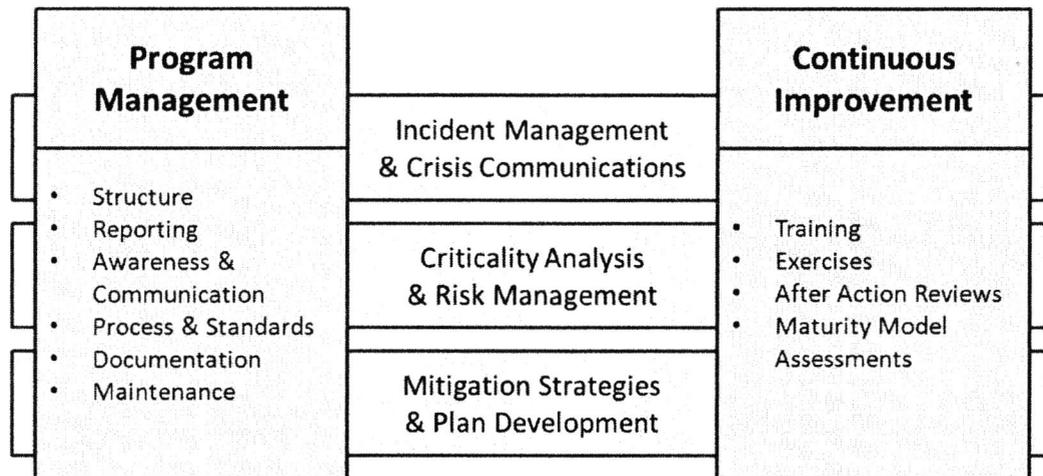
Program Management:

- Awareness & Communications – Employees and management are informed of current Business Continuity efforts or awareness campaigns through internal communication methods that often target all employees in the company.

- Process, Standards & Documentation– Common terminology, methodologies and formal documentation on standards and procedures help our large company stay consistent and current. All program documents are to be reviewed annually, at a minimum, with all key stakeholders.

- Reporting – Each year, the Business Continuity Office formally reports to Sprint's Executive Management on the efforts and status of the Business Continuity Program and partners with Corporate Audit on reporting risk information to the Board of Directors.

- Maintenance – Frequent reviews of plan details and processes are updated in a timely manner, following changes to contacts, suppliers, processes, organizational structures, etc.

Continuous Improvement:

- Training – Annual training cycles are followed to ensure familiarity with systems, processes and peer organizations. Ad-hoc training is also conducted for new team members or procedure changes.

- Exercises – Exercises are used to evaluate plans, educate personnel, and test functions and operational capability of Sprint's response organizations. Information related to these exercises is propriety to Sprint. Additionally, as part of the nation's critical infrastructure, Sprint participates in coordinated situation drills with FEMA, the Department of Homeland Security (DHS), and state emergency management agencies to ensure coordinated preparedness and response during a disaster. The most common types of exercises conducted are: Tabletop, Walk-through, Functional drills, and Full-scale.

  Tabletop Exercises - In a round-table setting, members of the response team meet to discuss their responsibilities and describe how they would react as a team to an emergency scenario.

They identify areas of overlap and confusion in a cost-effective and efficient manner before conducting a more demanding exercise.

Walk-Through Drills - Both management and the response team perform their emergency functions within the emergency response location.

Functional Drills - Tests designed to target specific functional processes within the recovery plan such as notification, response, communications, documentation, and team cohesiveness. In most cases, these functions should be tested separately to help identify improvement areas and to eliminate confusion. Observers are often used to evaluate these exercises.

Full-scale Exercises - Exercises simulated to be as close as possible to a real-life disaster. They may involve a combination of response teams, management, field operations, and outside agencies. During the simulated exercise, team members are expected to actually perform their disaster responsibilities.

- After Action Reviews (AARs) – Following an incident or an exercise, an AAR is conducted to ask participants to identify areas of success and improvement. These are documented as Lessons Learned and tracked to satisfactory completion.

- Maturity – Sprint uses an internally developed Maturity Model for benchmarking Business Continuity Program success and progress. The model is based on the Capability Maturity Model as developed by Carnegie Mellon University.

Incident Management & Crisis Communications

Knowing that unexpected events occur, Sprint's Incident Management and Crisis Communications teams are highly trained and tested. As with the overall program governance structure, full executive support and authority is integrated into the incident management structure. Sprint's seasoned professionals, across multiple fields of expertise, have responded to all major disasters impacting the United States in the last 13 years.

Executive Command Team (ECT) – During a disaster, the ECT is kept apprised of all activities and status. If the incident requires chief executive involvement, the ECT members engage to provide guidance and approval to make necessary response and recovery decisions. The Chief Executive Officer (CEO) is the Chairperson of the ECT.

Enterprise Incident Management Team (EIMT) – The Enterprise Incident Management Team (EIMT) convenes quickly as a way of sharing impact, status and critical decision-making during an incident. This team is flexible and scalable and built on the premise of an all-hazards response approach.

Incident Management Teams (IMTs) – An IMT consists of members of a single business unit and is designed to meet the needs of the company, customers and employees at the time of an incident. Examples of IMTs include IT, Network, Human Resources, Customer Care, Corporate Security and others. In all, there are more than 20 IMTs, each of varying size and complexity, capable of responding quickly and effectively to a wide array of issues. Each IMT have a designated chairperson that represents their organization on the EIMT call when the incident requires an EIMT response posture.

Continuity Analysis & Planning

Sprint formally analyzes risks and criticality of all parts of the business that could cause impacts or disruptions, if not properly mitigated and planned. These elements of the program ensure the proper priority and attention is applied to mitigation and plan development efforts.

Criticality Analysis:

Through various forms of analysis, such as Business Impact Analysis (BIA), criticality of business processes, applications, vendors, sites, network elements and other business aspects are determined. The criticality defines the appropriate level of mitigation and planning that is necessary. Critical business processes require a comparable criticality assigned to the applications they use, the suppliers they need and other dependencies.

Risk Management:

Sprint considers resiliency and Business Continuity risks to be a matter that requires tight management and controls. Potential risks are evaluated using an internal algorithm, to determine appropriate mitigation and Business Continuity planning efforts.

Mitigation Strategies & Plan Development:

Upon identification of potentially significant risks, Sprint makes every attempt to mitigate and plan for any eventuality that could affect Sprint's customers and employees. In most cases, the risks are marginalized or eliminated due to mitigation efforts. In some cases, the risks are highly improbable, but still require alternative planning, in the event that it should occur.

> The remainder of this document describes specific Business Continuity Plan details that are of interest to customers and potential customers of Sprint

Workforce Resiliency Overview

Pandemic Planning Overview

Sprint has implemented a pandemic plan that targets a safe and productive work environment for all employees and takes into consideration that absenteeism may be excessive for a period of time.

Sprint's plan allows for flexibility and scalability to adjust to changing events. The plan also incorporates a wide range of strategies that may be implemented by business units while ensuring communication and information sharing on status and success.

A separate plan document is available upon request for Sprint's Pandemic Plan.

Alternate Site and Remote Access Overview

Sprint utilizes information obtained through business impact analysis and risk reduction strategies in order to preserve business functions that are required in the face of a disaster. Depending on the size and scale of the event, Sprint has strategies in place to provide added capacity, alternative work locations and remote access if necessary to retain operations.

Business functions that require alternate sites, geographic redundancy and remote access capabilities are identified proactively and plans are periodically reviewed and revised as necessary in anticipation of any event.

Network Resiliency Overview

As a Mobile Telecommunications Leader, the resiliency of Sprint's network is of paramount interest to our customers.

Network Incident Management Team

Network Services' implementation of the Incident Command System (ICS), stays true to the core principles of ICS. This enables Sprint to leverage this best practice in wide-scale responses, using common terminology and standard organizational structures, to communicate efficiently internally and with customers such as Public Safety agencies as many of these agencies utilize ICS as well. Teams train on and deploy in standard ICS Sections, branches, units and strike teams, and emphasize span of control, comprehensive resource management, and other ICS principles.

Network teams leverage Sprint tools such as Direct Talk units, (off-network unit-to-unit communications) GPS hand held units, camera phones, laptop wireless cards, and smart phones to aid in response communication, situation assessment and resource tracking. The teams also maintain a pool of Satellite phones as a contingency plan to use in restoration. Teams continue to create innovative response tools, such as the unique Satellite backhaul SatCOLTs (Cell on Light Truck) that enable restoration of service when a traditional T1 circuit is not available.

The Network IMT receives notification of an actual or potential situation that requires activation (hurricane, earthquake, regional power outage, other event where business as usual would not resolve the situation), establishes the Emergency Operations Center (EOC), performs an initial overall assessment, establishes monitoring bridge(s), coordinates between agencies impacted by the event, assigns tasks, gathers status information, and performs executive notifications at prescribed times.

Cell Site Disaster Planning

Sprint's priority site restoration plan focuses resources and speeds recovery partly by making sure that existing infrastructure is operating properly under normal circumstances and by having a reaction plan for abnormal circumstances. To accomplish this, Sprint has implemented a detailed preventative maintenance program on site hardware to insure all systems and redundant equipment are in proper working order. Sprint sites are equipped with battery backup. Some sites have fixed generators or fuel cells for additional back-up power. . Sprint maintains a fleet of mobile generator sets, which can be deployed to Sprint service areas.

Cellular Network Disaster Planning

The Sprint wireless networks consist of multiple circuits on various combinations of copper, fiber, and microwave radio systems. Most Sprint hub locations are placed on their SONET bi-directional fiber rings. These rings significantly reduce the chance of network failure due to third party fiber damage, equipment failures, or other potential causes of service interruptions. Sprint's radio network provides significant overlapping coverage areas, which often allow cell sites to fully or partially compensate for a neighboring cell site. Also in an effort to minimize service impact when a site is down, Sprint maintains a fleet of "Cell On Wheels" (COWs), which are portable self-contained cell sites. COWs can be deployed to restore coverage from a damaged site or provide additional capacity in the immediate vicinity of an incident.

Switch Locations Disaster Planning

Sprint has implemented a distributed architecture for interconnection redundancy utilizing dual fiber facilities at all of our switch locations. These main switch locations currently have battery backup as well as permanent generators. In addition, site recovery plans have been developed for all major switch locations, prioritizing available options for relocation, and ensuring agility when faced with disaster

recovery issues. Most switches also have tap boxes to readily connect the output of a portable generator in the event of primary generator issues.

Overall Network Performance Management Efforts

The performance of Sprint's networks is monitored 24 hours a day, 7 days per week, 365 days a year by the Network Monitoring Centers (NMCs). In addition, local switching offices staffed by trained technicians and management coordinate with these larger operations centers, to ensure that Sprint's networks are properly maintained and network performance is at expected levels.

Network Restoration Prioritization

Sprint's Business Continuity Management Team works as a customer advocate when large network outages occur. The team works closely with network recovery response teams to establish customer prioritization once the backbone, TSP (Telecommunications Service Priority) and Critical Life Circuits are re-established. Sprint has an established service restoration priority and process.

Special Event Planning

Special events have the potential to adversely impact the customer experience due to the greatly increased traffic demand they place on communications networks. Sprint has a formal mature special events process with dedicated project management personnel and a cross-functional management tool. Teams archive records of recurring special events for future planning, and proactively search for one-time special events and leverage capacity planning teams in implementing enhancements to optimize the customer experience. Sprint has leveraged its experience in managing very large temporary users at NASCAR events in managing special events.

As a specialized type of special event, Sprint also interfaces with the NCS (National Communications System) in managing capacity needs at National Security Special Events, NSSEs.

Information Technology Resiliency Overview

Information Technology Incident Management Team

The IT Incident Management Team (IT IMT) provides timely decision making processes in the declaration of a disaster to ensure the proper decisions are made and communicated across the enterprise. The IT IMT team structure will minimize the disaster declaration time and potentially minimize the length of the event by quickly reacting to the event. The IT IMT is also responsible for maintaining and facilitating the execution of the recovery plans in conjunction with Resource & Priority Management (RPM).

Information Technology Incident Command Centers

The IT IMT Command Center serves as a centralized arena to manage disaster related operations. Recovery personnel execute defined processes and procedures, communicate and provide resources to effectively assess and manage disaster events. The Incident Command Centers are geographically redundant.

Data Center and System Resiliency Planning

The IT IMT is a proactive planning group that works in partnership with peer IMT organizations. The collective team is responsible for the accuracy and integrity of current information in their particular area of responsibility, including internal procedures, available systems, resources, call trees and points of contact. The IT IMT provides personnel with the necessary resources to assist with the restoration process. Sprint-Data Centers are held to exceptionally high and stringent industry, but more importantly, self-imposed standards of structural design, engineering, technology, redundancy, security, maintenance and 24x7 operations. Data Centers are geographically diverse and have the capability to execute an internally developed disaster recovery methodology of Internal Business Recovery (IBR) where on Data Center functions as the recovery site for another Data Center.

IT Network Restoration Prioritization

Critical Applications supporting the internal and external client community have been prioritized based on application impact analysis in order to expedite and control the recovery process. Data required for recovery of operating systems, production libraries, and application systems are backed up regularly and placed in off-site storage.

Emergency Response Team (ERT)

Who is the ERT?

Sprint's ERT is an experienced cross functional group which consists of a national team of full time, dedicated personnel as well as over a thousand of ERT Reservists across the country, that provides wireless telecommunications equipment, infrastructure and personnel operations support to federal, state and local public safety, law enforcement, military agencies and private Sector Organizations during declared emergencies, field training exercises, agency specific short term communication needs and National Special Security Events.

Support for Urgent Crisis Needs

The ERT designs and implements the internal policies and procedures necessary to enable timely and effective deployments of Sprint's products and services. The ERT fully supports high volume, short notice voice and data communication needs of emergency and disaster personnel with its SatCOLTs (Satellite Cell on Light Truck), Satellite IP Equipment, satellite earth station, and inventory of over twenty five thousand handsets and aircards which can be rapidly deployed to support short term communications.

ERT in the EOCs

During a number of recent disasters, reservists staffed State and Local Emergency Operations Centers (EOC) to relay first-hand information back to agencies that rely on critical communications. Having reservist representation at EOC's is valuable for a number of reasons: Reservists provide real time information and status updates to the EOC's on the progress of our network recovery efforts ; Allows State EOC's to provide direction on priority areas for Network restoration; Coordinate information from other critical infrastructure functions, such as Energy/Power and Transportation; and obtain location of FEMA and other emergency responder command posts using Sprint handsets to help plan for influx of capacity needs. The EOC initiative is an example of Sprint's proactive approach during an incident, through partnership, involvement and communications support. Partnering with Emergency Management agencies in cities and counties throughout the United States provides better coordination of Sprint and ERT support resources for Disaster Preparation and Response. Trained ERT Reservists are more actively involved in providing their communities with critical volunteer support. Agencies are able to have a direct channel into Sprint approved support organizations with more expedited response times and capabilities, providing critical communications support when it's needed the most.

ERT has deployed in support of over 4800 deployments supporting federal, state and local public safety, law enforcement, military and enterprise organizations; including 36 Presidential declared disasters since 2002.

Contact us

For more information on Sprint's Emergency Response Team, please visit us at www.sprint.com/ert, become a fan on Facebook at www.facebook.com/SprintEmergencyResponseTeam email us at ERTRequests@sprint.com or for emergency communications support, contact our 24x7x365 ERT Hotline at 1-888-639-0020 or for GETS users 254-295-2220.